

07/09/2010 10:03 FAX

003/003

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DWIGHT SIMONSON

Plaintiff,

v.

**THE HERTZ CORPORATION,
AMERICAN TRAFFIC SOLUTIONS INC.,
and PLATEPASS, LLC,**

Defendants.

Civil Action No.: 1:10-CV-01585-NLH-KMW

**STIPULATION EXTENDING TIME FOR
DEFENDANTS TO SUBMIT THEIR
REPLY PAPERS IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

It is hereby stipulated and agreed by and between counsel for the parties that the time within which defendants, The Hertz Corporation, American Traffic Solutions, Inc., and Platepass LLC shall submit their Reply Papers in support of Defendants' Motion to Dismiss is extended by ten (10) days. The defendants' Reply Papers shall be submitted on or before July 22, 2010.

COHEN, PLACITELLA & ROTH, P.C.
Attorneys for Plaintiff Dwight Simonson

/s/ Michael Coren
Michael Coren, Esquire

BROWN & CONNERY, LLP
Attorneys for Defendants The Hertz
Corporation, American Traffic Solutions, Inc.,
and Platepass LLC

/s/ Michael J. Vassalotti
Michael J. Vassalotti, Esquire

Approved:



Honorable Noel L. Hillman, U.S.D.J.

07/09/2010 10:03 FAX

001/003

BROWN & CONNERY, LLP
ATTORNEYS AT LAW AND PROCTORS IN ADMIRALTY
360 Haddon Avenue
P.O. Box 539
Westmont, New Jersey 08108

TELEPHONE (856) 854-8900
FACSIMILE (856) 858-4967

We are Sending 3 Pages
(Including This Cover Page)

CONFIDENTIALITY NOTICE: The documents accompanying this facsimile transmission contain confidential information belonging to the sender which is legally privileged. The information is intended only for the use of the individual(s) or entity(ies) named below. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone to arrange for return of the original documents to us.

DELIVERY INSTRUCTIONS:

DATE: July 9, 2010
FROM: Michael J. Vassalotti, Esquire
RE: Dwight Simonson v. Hertz Corp., et al.
FILE NO.: 10-0544

Honorable Noel L. Hillman	United States District Court	757-5070

☐

ORIGINAL SENT BY
REGULAR MAIL

☐

ORIGINAL SENT BY
OVERNIGHT DELIVERY

☐

NO ORIGINAL WILL BE SENT

INSTRUCTIONS/COMMENTS:

WE ARE TRANSMITTING FROM A RICOH FAX 3500L. IF YOU EXPERIENCE ANY PROBLEMS IN RECEIVING ANY OF THESE PAGES, PLEASE CALL Elaine AS SOON AS POSSIBLE AT (856-854-8900), EXT. 261. THANK YOU.

07/09/2010 10:03 FAX

002/003

BROWN & CONNERY LLP

ATTORNEYS AT LAW AND PROCTORS IN ADMIRALTY
360 HADDON AVENUE
P.O. BOX 539
WESTMONT, NEW JERSEY 08108

TELEPHONE: (856) 854-8900
FACSIMILE: (856) 858-4967
www.brownconnery.com

STEVEN G. WOLSCHINA
PAUL MAINARDI
MICHAEL J. VASSALOTTI*
WILLIAM M. TAMBUSI*
MARK P. ASSELTA*
STEPHEN J. DEFEO*
JOSEPH M. NARDI, III*
CHRISTINE P. O'HEARN*
JOSEPH T. CARNEY*
KAREN A. MCGUINNESS*
SUSAN M. LEMING*
SHAWN C. HUBER*
MARK CAIRA
LOUIS R. LESSIG*
JOSEPH M. GAREMORE*

OF COUNSEL:

NATHAN A. FRIEDMAN*
KATHIE L. RENNER*
MICHAEL R. MIGNOGNA*
JOSEPH G. ANTINORI
CARL J. GREGORIO*
CHRISTOPHER J. TUCCI*

THOMAS F. CONNERY, JR. (1913-2000)
HORACE G. BROWN (1902-1990)
HOWARD G. KULP, JR. (1906-1997)

WOODBURY, NJ 08096
(856) 812-8900

CAMDEN, NJ 08102
(856) 365-5100

PHILADELPHIA, PA 19102
(215) 592-4352

MICHELLE H. BADOLATO*
WILLIAM F. COOK*
MICHAEL J. DIPIERO*
BRIAN P. FAULK
GINA M. FIGUEIRA*
ABIGAIL M. GREEN*
JENNIFER A. HARRIS
PATRICK J. HOLSTON*
JEFFREY R. JOHNSON*
DIANE S. KANE*
JANINE M. LLOYD*
DONALD K. LUDMAN.
BETH L. MARLIN*
PAMELA A. MULLIGAN
CHRISTOPHER A. ORLANDO*
TAIRONDA E. PHOENIX*
KENNETH J. SCHWEIKER, JR.
BLAIR C. TALTY*
MICHAEL J. WATSON*

* ALSO ADMITTED IN PENNSYLVANIA
* ALSO ADMITTED IN NEW YORK
* ALSO ADMITTED IN DELAWARE
* ALSO ADMITTED IN MARYLAND
* CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS
CIVIL TRIAL ATTORNEY
* CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS WORKERS'
COMPENSATION LAW
ATTORNEY

July 9, 2010

VIA FACSIMILE (856.757.5070) & ECF

Honorable Noel L. Hillman
United States District Court for the
District of New Jersey
Mitchell H. Cohen Federal Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

Attn: Michael Miles, Law Clerk

Re: Dwight Simonson v. Hertz Corporation, et al.
Docket No.: 1:10-CV-01585-NLH-KMW

Dear Judge Hillman:

We represent defendants, The Hertz Corporation, American Traffic Solutions, Inc. and Platepass LLC in the above action. Counsel for the plaintiff graciously consented to extend the deadline for the defendants to submit their reply papers in support of the Motion to Dismiss which is pending before Your Honor. Enclosed is a Stipulation agreed upon by the parties. We respectfully request that Your Honor approve and file the Stipulation.

Thank you in advance for your anticipated cooperation. If you have any questions, please do not hesitate to have your staff contact me.

Very truly yours,

/s/ Michael J. Vassalotti

Michael J. Vassalotti

MJV/eab
Enclosure

cc: Michael Coren, Esquire (via electronic mail & ecf w/ enc.)